

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

CLEVELAND POLICE PATROLMEN'S	)	CASE NO.: 1:18-CV-00863
ASSOCIATION, ET AL.	)	
	)	JUDGE: CHRISTOPHER A. BOYKO
Plaintiffs	)	
	)	
v.	)	
	)	<b><u>PLAINTIFFS' MOTION FOR LEAVE</u></b>
CITY OF CLEVELAND, ET AL.,	)	<b><u>TO FILE AN AMENDED MOTION</u></b>
	)	<b><u>FOR A TEMPORARY RESTRAINING</u></b>
Defendants.	)	<b><u>ORDER/PRELIMINARY INJUNCTION</u></b>
	)	<b><u>UNDER SEAL</u></b>

Now comes the Plaintiffs, by and through their undersigned counsel, and respectfully requests this Honorable Court to grant the Plaintiffs leave to file their Amended Motion for a Temporary Restraining Order under seal. The Plaintiffs are requesting to file this Motion under seal because it contains sensitive information pertaining to the member(s) of the CPPA. This Honorable Court previously ruled that the Plaintiffs had not apprised the Court of sufficient facts to make a showing of a strong likelihood of success on the merits. (R. 4, PAGE ID 28). The Court stated that it does not have any facts as to how these text messages were obtained and what the content of the speech is. These facts are confidential and have not yet been disclosed to the public. The entire purpose of this litigation is to stop the City from public disclosure of the disciplinary allegation(s) against the affected member(s) of the CPPA as a result of these messages. If the Plaintiffs are forced to place the relevant facts on the public record, they could suffer irreparable personal and professional harm. Based upon the foregoing, the Plaintiff's respectfully request this Honorable Court to grant the Plaintiff's Motion in the interest of justice.

Respectfully submitted,

/s/ Marisa L. Serrat  
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Attorney for the Plaintiffs

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**CERTIFICATE OF SERVICE**

A copy of the foregoing was served upon all parties via the Court's electronic filing system this 18th day of April, 2018.

/s/ Marisa L. Serrat  
MARISA L. SERRAT (#0088840)  
Attorney for the Plaintiffs